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Attorneys for Defendant State of
 Nevada Ex. Rel. Board of Regents
 of Nevada System of Higher Education

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

CHRISTINE CASEY,)	Case No. 3:20-cv-00720-MMD-CLB
)	
Plaintiff,)	
)	
vs.)	
)	
STATE OF NEVADA EX. REL. BOARD OF)	<u>STIPULATION AND REQUEST FOR</u>
REGENTS OF NEVADA SYSTEM OF)	<u>EXTENSION OF TIME FOR</u>
HIGHER EDUCATION, a state entity, Victor)	<u>DEFENDANT STATE OF NEVADA</u>
Redding, an individual, Thomas Reilly, an)	<u>EX. REL. BOARD OF REGENTS OF</u>
individual, Joseph Reynolds, an individual,)	<u>NEVADA SYSTEM OF HIGHER</u>
Crystal Abba, an individual, Dean Gould, an)	<u>EDUCATION TO RESPOND TO</u>
individual, Zelam Bogale, an individual, DOES)	<u>PLAINTIFF'S COMPLAINT</u>
1-50 inclusive, and ROE Corporations 1-50)	
inclusive.)	(First Request)
)	
Defendants.)	
)	

The Parties, by and through their respective counsel of record, stipulate and request that this Court extend the time for Defendant State of Nevada Ex. Rel. Board of Regents of Nevada System of Higher Education (hereinafter referred to as "NSHE"), to respond to Plaintiff's Complaint, up to and including, Friday, March 5, 2021. In support of this Stipulation and Request, the parties state as follows:

1. Plaintiff served Defendant NSHE with a copy of the Summons and Complaint on January 13, 2021. The present deadline for NSHE to respond to Plaintiff's Complaint is Wednesday, February 3, 2021.

2. At the present time, it is the undersigned counsel's understanding that none of the individually-named parties have yet been served in this matter.

3. On January 27, 2021, Scott Abbott, counsel for NSHE, contacted Plaintiff's counsel, Jenny Foley, to advise that his law firm was currently assessing potential joint representation of the individually-named parties, along with its representation of NSHE, and requested an extension of time to respond to the Complaint. Ms. Foley and Mr. Abbott agreed to a 30-day extension of time for NSHE to respond to Plaintiff's Complaint.

4. This is the first request for an extension of time for Defendant NSHE to respond to Plaintiff's Complaint, and is not sought for any improper purpose or other reason of delay. This extension is sought only to secure sufficient time to assess whether all of the named Defendants may be jointly represented in this matter and to gather information necessary to respond to Plaintiff's Complaint.

WHEREFORE, the parties respectfully request that Defendant NSHE be permitted an extension of time, up to and including **March 5, 2021**, to respond to Plaintiff's Complaint.

DATED this 2nd day of February 2021.

HKM EMPLOYMENT ATTORNEYS LLP

KAMER ZUCKER ABBOTT

By: /s/ Jenny L. Foley

By: /s/ Scott M. Abbott

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Attorney for Plaintiff

Attorneys for Defendant NSHE

ORDER

IT IS SO ORDERED.

DATED: February 2, 2021


UNITED STATES MAGISTRATE JUDGE